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and

William S. Sugden, Esq. (*Pro Hac Vice* Pending)  
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*Counsel to AG Financial Products Inc.; Consolidated  
Container Company LLC; Dell Global B.V.; Greywolf Capital  
Management L.P.; Main Street Natural Gas, Inc.; the  
Municipal Electric Authority of Georgia; and Bank of America,  
National Association successor by merger with LaSalle Bank  
National Association, as Trustee under certain Indentures,  
Pooling and Servicing Agreements, Trust Agreements and  
Similar Agreements*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Chapter 11
	:	
Lehman Brothers Holdings Inc., <i>et al.</i> ,	:	Case No. 08-13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)
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**MOTION FOR ADMISSION TO PRACTICE, *PRO HAC VICE***

William Hao (“Movant”), a member in good standing of the Bar of the State of New York, an attorney admitted to practice before the United States Bankruptcy Court for the Southern District of New York, and a member of Alston & Bird LLP, hereby moves the Court to enter an order permitting William S. Sugden, also a member of Alston & Bird LLP, to practice

*pro hac vice* before the United States Bankruptcy Court for the Southern District of New York to represent AG Financial Products Inc.; Consolidated Container Company LLC; Dell Global B.V.; Greywolf Capital Management L.P.; Main Street Natural Gas, Inc.; the Municipal Electric Authority of Georgia; and Bank of America, National Association successor by merger with LaSalle Bank National Association, as Trustee under certain Indentures, Pooling and Servicing Agreements, Trust Agreements and Similar Agreements, in the above referenced chapter 11 cases, pursuant to Local Rule 2090-1(b) of the United States Bankruptcy Court for the Southern District of New York. In support of the Motion, Movant states as follows:

1. Mr. Sugden is a member in good standing of the Bar of the State of Georgia and is also admitted to practice before the United States District Court for the Northern District of Georgia. There are no disciplinary proceedings pending in any court against Mr. Sugden.

2. In support of the relief requested in this Motion, an affirmation of William S. Sugden is attached as Exhibit A.

3. Movant requests that this Court approve this Motion so that Mr. Sugden may file pleadings and appear and be heard at hearings in these chapter 11 cases.

4. No previous request for the relief sought herein has been made to this or any other court.

**WHEREFORE**, Movant respectfully requests that the Court enter an Order, substantially in the form attached hereto as Exhibit B, permitting William S. Sugden to appear *pro hac vice* in association with the Movant as counsel to AG Financial Products Inc.; Consolidated Container Company LLC; Dell Global B.V.; Greywolf Capital Management L.P.; Main Street Natural Gas, Inc.; the Municipal Electric Authority of Georgia; and Bank of America, National Association successor by merger with LaSalle Bank National Association, as

Trustee under certain Indentures, Pooling and Servicing Agreements, Trust Agreements and Similar Agreements, in these chapter 11 cases and granting such other and further relief as is just.

Dated: New York, New York  
August 21, 2009

Respectfully submitted,

ALSTON & BIRD LLP

By: /s/ William Hao  
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